

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

Bryant Barnett

CLERK  
U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY

2024 JUN 28 A 10: 53

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Apelles, LLC

**COMPLAINT**

Jury Trial ☒ Yes ☒ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

**I. Parties in this complaint:**

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name  
Street Address  
County, City  
State & Zip Code  
Telephone Number

Bryant Barnett  
191 Wainwright St  
Essex, Newark  
~~100~~ ~~07112~~ New Jersey [07112]  
402 427 0152

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name Apelles, LLC  
 Street Address 3700 Corporate Dr  
 County, City Suite 240  
 State & Zip Code Columbus, OH 43231

Defendant No. 2

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

Defendant No. 3

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (*check all that apply*)

☐ Federal Questions ☒ Diversity of Citizenship  
☐ U.S. Government Plaintiff ☐ U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship New Jersey

Defendant(s) state(s) of citizenship Ohio

### III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? My Place of Business; My dwelling

B. What date and approximate time did the events giving rise to your claim(s) occur? The date was on or about March 11, 2024 and the approximate time was 1:00pm EST

C. Facts: Please See Attached

What  
happened  
to you?

Who did  
what?

Was  
anyone  
else  
involved?

Who else  
saw what  
happened?

### **FACTS**

On or about March 11, 2024 near the 1:00pm est hour I received a communication from Apelles, LLC, via United States Postal Service. Apelles, LLC, who is not legally or lawfully bonded / licensed / registered to do business in New Jersey, reached out to me without receiving my consent. This communication from Apelles, LLC stated that a debt was owed to them and that they want me to pay it.

**[SEE EXHIBIT A]**

On March 27, 2024, I responded with a letter demanding that Apelles prove to me that they have a contract or agreement to do business with me that is signed by my hand and in wet ink. I also asked copies for all documents for the account 7881630 that they opened with my personal private identifying information and without my consent.

**[SEE EXHIBIT B]**

Anita Skinner, VP of compliance at Apelles, LLC responded to my communication. However, did not provide all of the information requested nor did Anita answer all of the questions submitted.

**[SEE EXHIBIT C]**

In this communication **[EXHIBIT C]**, Anita Skinner of Apelles, LLC admitted to receiving my personal private sensitive information from ADT In March 2024, without my knowledge and without my written consent from ADT and used my personal private sensitive information without my knowledge and without my written consent to open an account in their system and for Apelles, LLC's benefit and personal gain.

Anita Skinner of Apelles, LLC stated in that communication that they will close the account and send the information and the communication that to ADT. This willful admission confirms that my personal private identifying sensitive information was transferred / shared again, from Apelles, LLC back to ADT without my consent.

On April 17, 2024, I drafted a notice of demand and self-executing contract. This correspondence was received by Apelles, LLC on April 23, 2024.

**[SEE EXHIBIT D].**

In this communication I demanded that Apelles, LLC provide proof that they are properly licensed and/or bonded to conduct business of credit collections in the state of New Jersey as of March 1, 2024. I also demanded that Apelles, LLC pay me for the offenses they

committed against. They invaded my privacy by transacting with ADT to receive and also give my personal private identifying sensitive information. In that letter, it was demanded by me that \$25,000 USD be paid by May 1, 2024, or \$30,000 USD if the payment should be received after May 1, 2024 and by May 8, 2024. This is what was requested for the infractions committed against me. As of the date of June 26, 2024, no response to that communication was received, nor was any payment for settlement received to settle this matter. According to the self-executing contract, if Apelles, LLC chose not to respond, Apelles, LLC would have tacitly agreed that they committed the offenses in the communication against me. Apelles, LLC chose not to rebut any of the facts stated within that communication **[SEE EXHIBIT D]**.

On June 26, 2024 I received a response from the New Jersey Department of Treasury. In this email, they replied to my inquiry of Apelles, LLC's ability to do business as a debt collector in the state of New Jersey. The Department replied that Apelles, LLC is NOT bonded and therefore cannot do business as a debt collector in the state of New Jersey. **[SEE EXHIBIT E]**

**IV. Injuries:**

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. See Attached

**V. Relief:**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

See Attached

### **Injuries**

I have suffered excessive and extreme emotional damage from these reckless actions committed against me by and between Apelles, LLC with ADT.

Apelles, LLC has disrupted my peace. I just want peace in my life. I long to have peace and live peaceably among all.

I have become paranoid. I fear now because in my mind, I believe that my privacy and personal information is being purchased between Apelles, LLC and many other companies on the daily basis as it has been in this situation; without my knowledge and without my consent. I am now fearful that Apelles, LLC will now do what is needed (including but not limited to physical harm to me) for them to recover any financial loses that they took when they transacted with ADT to obtain my information. Because of my knowledge of these and other laws, I was able to express myself, which kept me from being a victim to their profiting scheme.

I fear that Apelles, LLC and ADT are constantly selling my information without my knowledge and without my consent and with no regard to my physical safety and to all of those around me, and in and around my home and place of business.

I believe that Apelles, LLC purchased or engaged in this transaction because ADT no longer services the security of my home and business because of an alleged-debt owed to ADT. Because of this, I fear and strongly believe that now my location is a target for burglarizing and other life-threatening crimes.

Because of these new fears, I have lost days/nights of sleep and not been able to properly conduct business and work at my full capacity.

I do not feel safe at this location and have contemplated relocating because of ADT's and Apelles, LLC's desire to simply make money off of my personal private sensitive identifying information; disregarding my privacy and my safety.

In my mind I question, "Who else has Apelles, LLC and ADT sold my information to?"

I am very fearful and in deep emotional distress because of the willful negligence committed against me by Apelles and ADT, whom have agreed to share my personal private sensitive identifying information without my knowledge and without my consent, which was done for monetary and selfish gain.

ADT Inc. (ADT) is in the security and protection business. However, ADT and Apelles, LLC seem to find it acceptable to sell my personal private sensitive information amongst themselves for profit and selfish gain, and leave me vulnerable to attacks from strangers and all other unknown companies.

I do not feel safe. I fear that I will be a victim of retaliation from Apelles, LLC by way of physical harm towards me for filing this claim against them and also that they may again transfer my personal private sensitive identifying information. Because of this, we are contemplating to relocation.

## **RELIEF**

**For transferring / receiving of my personal private sensitive information without my written consent from ADT and using my personal private sensitive information without my written consent to open an account for their personal gain: \$250,000 (two hundred-fifty thousand)**

**For transferring / receiving of my personal private sensitive information without my written consent to ADT: \$250,000 (two hundred-fifty thousand)**

**For initiating communication with me without my written consent, for the express use of my LEGAL NAME with the intention to profit: \$100,000 (one hundred thousand)**

**For each unsolicited / solicited letter of harassment: \$5,000.00 (five thousand)**

**For each correspondence that I write to Respondents and/or Agents / third parties of due to solicited and/or unsolicited meetings, letters of harassment or breach of the Common Law: \$2,000.00 (two thousand)**

**For 100 hours of legal research (\$550 per hour): \$55,000.00 (fifty-five thousand)**

**For performance and court appearance: \$100,000.00 (one hundred thousand)**

### **Relief for Injury Caused by Apelles, LLC**

**For the severe mental and emotional stress suffered because of the actions by Apelles, LLC: \$1,500,000.00 (one million five hundred thousand)**

**Total Relief: \$2,262,000.00 (two million two hundred sixty-two thousand)**

**\*All above-listed claims / relief to be payable and convertible at the legal and lawful ratio prescribed by law of Federal Reserve Notes to silver dollars per person per violation.**